

Widener University Delaware Law School

Environmental & Natural Resources Law Clinic
Kenneth T. Kristl, Professor of Law and Director

June 26, 2018

VIA EMAIL & DELAFILE

The Honorable Mark Lawrence
Senior Hearing Examiner
Delaware Public Service Commission
861 Silver Lake Boulevard, Suite 100
Dover, Delaware 19904

RE: PSC Docket #17-1094: Sierra Club Response Regarding Procedural Schedule

Dear Hearing Examiner Lawrence:

Pursuant to your June 25, 2018 letter to parties, the Sierra Club provides this response in support of Delmarva Power's request to defer procedural deadlines pending release of Exelon's electric vehicle study. Due to the key role for vehicle electrification in achieving important public health and climate outcomes in Delaware, the Sierra Club supports the expeditious adjudication of the proposals submitted by Delmarva Power in this docket. At the same time, given the novelty of the issues presented by Delmarva Power's proposals and broader repercussions of the resolution of this docket, it is critical that decisions on these proposals are made based on the best available information.

Based on the description of the Exelon study provided in Delmarva Power's June 22nd filing, the Sierra Club believes this study is likely provide information that will be valuable to the parties in their evaluation of Delmarva Power's proposals and directly relevant to the Commission in its determination of whether the proposals should be approved. In particular, Delmarva Power notes that the study will provide cost and societal benefit analyses specific to Delaware, including analysis of potential impacts to Delmarva Power customers based on electric vehicle growth and managed charging scenarios.¹ The Sierra Club expects that these analyses will shed light on questions raised in parties' testimony about who will benefit from investments in electric vehicle charging infrastructure and rate design.

The Sierra Club supports deferring the current procedural deadlines pending release of the report, and, once the report is filed, recommends holding a scheduling call with the parties to determine a fair

¹ Delmarva Power Ltr. re Procedural Schedule (June 22, 2018), at 1.

procedure to vet the report and continue toward an expeditious resolution of the pending proposals.

Respectfully submitted,

/s/ Kenneth T. Kristl

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing SIERRA CLUB RESPONSE REGARDING PROCEDURAL SCHEDULE to be served upon the following persons:

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via electronic mail this 26th day of June, 2018.

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